



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

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Mr. John R. Denman, Director  
Fossil Generation  
Arizona Public Service Company  
P.O. Box 53999  
Phoenix, AZ 85072-3999

RE: Newly Found Contamination at APS Ocotillo Power Plant  
APS Letter of August 1, 1991 to EPA: Diane Grosser

Dear Mr. Denman:

Thank you for your letter of August 1, 1991, to Diane Grosser of EPA. Ms. Grosser and I are colleagues on the South Indian Bend Wash team for EPA. Your letter provides additional information to EPA's Request for Information Letter, and informs EPA that several new locations have been discovered at the APS Ocotillo Power Plant where contamination does or may exist. You also state that investigations are underway at these locations. We appreciate your continued cooperation with the Indian Bend Wash Remedial Investigation, and your efforts to disclose information about your facility.

The recent events and activities at the Plant require additional actions from you with respect to EPA, however. Because your recent findings at the Ocotillo plant have potential implications for both the SIBW source and groundwater investigations, EPA should be involved as soon as possible. We also encourage your continued cooperation and coordination with ADEQ, especially for the underground oil tanks.

As you know, the APS Ocotillo Power Plant lies within a Federal Superfund Site, and APS is one of the facilities under investigation as a potential source of contamination. As EPA may, at its discretion, issue an enforcement action to APS requiring investigatory work at the Plant, it is imperative that any work APS performs now be in accordance with the sampling, quality control, and other planning requirements of EPA. Otherwise, EPA may find that the data collected is incomplete, is of insufficient quality, or cannot be supported by proper documentation. In such a case, field work or cleanup may have to be re-performed, and/or remobilization costs may be incurred by APS. This would not be to your benefit or ours.

Your letter does not provide the sampling data that pertain to the various sampling efforts that have identified these new areas. We hereby extend our Section 104(e) information request to include,

as soon as possible, a map of all the areas in question, the locations of samples to date, the depths of the samples, the methods used/analytes tested, and the results of the analyses.

We strongly recommend that before additional field efforts are conducted, you present to EPA the investigation plan, including sampling locations, depths, sampling protocols, and laboratory planning documents. We can provide for you our standard sampling and lab protocols and attending data documentation requirements to ensure that the quality control for the data is assured and that the data can be reviewed. Also, in EPA's Site Inspection Memorandum for the Plant (May 1991), we identified several areas where sampling for volatile organic compounds (VOCs) should be conducted; you should consider adding these to the current investigation so that you do not have to pay for field remobilization later.

We note that you have sampled for VOCs at both the laboratory excavation and the transformer area. We assume that these samples were soil samples. You stated that you found "no VOCs" at the laboratory excavation, and "low levels of VOCs" at the transformer area, although you did not mention which VOCs were found. It should be noted that EPA has found that VOCs tend to reside in the gaseous phase in these arid, low-organic-carbon soils. In addition, collection of soil samples is difficult without significant aeration of the sample, especially if a backhoe is used. The combined result of this is that often soil samples show no or low levels of VOCs, while soil gas shows high levels of VOC contaminant, which is still a threat to groundwater. We realize that EPA has already taken many soil gas samples on the Plant property, virtually all of which showed non-detect for VOCs. Nonetheless, given the plant size, soil gas monitoring specifically at the newly-discovered potentially contaminated areas may be warranted and should be considered before a field effort is mobilized.

Please send us your current results and additional investigation plans as soon as possible. We are ready to discuss your plans with you. Again, thank you for your continued cooperation in the investigation. If you have any questions about this letter, please contact me at (415) 744-2363.

Sincerely,

  
Jeffrey A. Dhont  
Remedial Project Manager  
Superfund Enforcement Branch

cc: Chris Walker, APS  
Shiela Schmidt, APS  
Tim Steele, ADEQ  
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